

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Boqueron Field Office P.O. Box 491 Boqueron, Puerto Rico 00622



03.01-214/02-02152

February 4, 2002

Mr. Chris Penny Atlantic Division Code EV23 1510 Gilbert St Norfolk, VA 23511-2699

Re: Vieques Background Investigation Report

Dear Mr. Penny:

Please excuse the delay but enclosed are our comments on the Draft Soil, Groundwater, Surface Water and Sediment Background Investigation Report. We find the report to be well written and informative but not in laymen terms. There should be a summary of the report that details which metals were found and uses a reference to relate these levels to different water or sediment quality criteria. Since the majority of the area is composed of mangrove swamp, we recommend that for surface water, the PR EQB coastal and estuarine water quality criteria for the propagation and preservation of species that depend on that water body be used. We also recommend that metal levels in surface water be compared to the latest EPA freshwater aquatic life water quality criteria as well as ambient water quality criteria. Results for sediments should be compared to the NOAA national status and trends program. If possible, Vieques background levels should be compared with what is considered for be background in the main island of Puerto Rico or the continental US.

The summary should clearly indicate the results for all the metals in the different media sampled and how those results compare to the different quality standards and known background levels. This would provide to all readers a better idea of the quality of the soil, groundwater and surface water in western Vieques.

We agree with the report's conclusion that because of the geology of the area, there are certain metals that naturally occur in the different media found in western Vieques and that the mere presence of these metals does not constitute a level of contamination. However, elevated levels of these metals, even though they naturally occur in the area, may point to another source other than the parent material.

Thank you for the opportunity to comment on this document, again, please accept my apologies for the delay. If you have any questions please contact Felix Lopez of my staff at 787-851-7297, ext. 26.

Sincerely,

James P Oland Field Supervisor

cc:

Vieques NWR, Vieques EQB, San Juan DNER, San Juan Winston Martinez, NSRR, Ceiba EPA, San Juan